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8 **United States District Court**  
9 **Southern District of California**

10 (Hon. Nita L. Stormes)

11 UNITED STATES OF AMERICA,	)	Criminal Case No. 08CR1455BEN(NLS)
	)	
12 Plaintiff,	)	<b>Notice Of Motion And Motion To Take</b>
	)	<b>The Videotaped Deposition Of A Material</b>
13 v.	)	<b>Witness And Thereafter Release Him</b>
	)	<b>From Custody</b>
14 ARA E. AVETYANTS, ASHOT BARSEGHIAN,	)	
and ARSEN GRISHAI MOTIVOSYAN,	)	Date: June 12, 2008
	)	Time: 9:30 a.m.
15 Defendant(s).	)	Judge: Nita L. Stormes
	)	Room: F
16	)	

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19 **Notice Of Hearing**

20 On June 12, 2008 at 9:30 a.m., or as soon thereafter as counsel may be heard, material  
21 witness Ara Hakobyan [the "Material Witness"] by and through his counsel, Attorney Ned Lynch, will  
22 bring a motion for a court order to conduct videotaped deposition of the Material Witness. This  
23 motion will be heard by Hon. Nita L. Stormes in Courtroom F of the U.S. District Court for the  
24 Southern District of California.

25 **Motion**

26 The Material Witness, by and through his counsel, Ned Lynch, and pursuant to Federal Rules  
27 of Criminal Procedure 15 and 18 U.S.C. § 3144, move this court for an order to take his videotaped  
28 deposition and thereafter release him from custody at the conclusion of the deposition for his return  
to his home country.

1 This motion is based upon this notice, the memorandum of points and authorities filed in  
2 support of this motion, the declaration of Attorney Ned Lynch, the files and records in the cases  
3 noted above, and any and all other evidence and arguments that may be brought to the court's  
4 attention prior to or during the hearing on this motion.

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6 Dated: May 18, 2008

s/Ned Lynch

Ned Lynch, attorney for the Material Witness

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